

Virginia Stationary Source Operating Permit (Title V)

Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, chapter 13, ' 10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-305 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Permit Number

PRO50766

Effective Date

October 1, 2001

Expiration Date

October 1, 2006

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name:	HON Industries
Mailing Address:	414 East Third Street Muscatine, IA 52761
Facility Name:	The HON Company
DEQ Registration Number:	50766
Facility Location:	11200 Old Stage Road Chester, VA 23831

Permit Issued this first day of October, 2001

Dennis H. Treacy, Director
Department of Environmental Quality

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Part I. -- Facility Information

Permittee

The HON Company
414 East Third Street
Muscatine, IA 52761

Facility

The HON Company
11200 Old Stage Road
Chester, VA 23836-2445

Responsible Official

Mr. Jim Fuller
V.P./General Manager
(804) 796-3100

Contact person

Ms. Sonja Edkin
Safety/Environmental Manager
(804) 796-3116

AIRS Identification Number: 51-041-0133

Facility Description: SIC Code Number - 2522 - The steel furniture manufacturing process at HON includes metal fabrication, welding, metal parts washing, spray coating, and coating curing. Some assembly operations involve adhesive usage without VOCs. On a step by step basis, the raw materials including coated and uncoated steel are received and fabricated into furniture components. Various components are welded or glued in assembly operations. The uncoated components are cleaned in three stage washers and dried in gas fired ovens before transfer to one of the coating lines. Coating is accomplished through manual electrostatic spray application. Overspray is collected on a metal baffle system and either reformulated for reuse or shipped to the paint manufacturer for reformulation or is shipped off site as hazardous waste. Overspray not collected on the baffles passes through dry polyester filters before exhausting through the coating line stacks. In addition, three lines operate with small dip tanks. Gas fired ovens set the coating. Final assembled products are packaged and shipped.

Part II. -- Emissions Unit Specific Requirements

A. Insignificant Emission Unit Inventory List

Table No. II A. Insignificant Emission Unit Inventory List				
Emission Unit No.	Emission Unit Description	Citation (9 VAC_)	Pollutant Emitted (5-80-720 B.)	Rated Capacity* (5-80-720 C.)
EU1b	One (1) water based Partwasher and associated burner for File line no. 1	5-80-720 A.,C.2.	PM10, SO ₂ , NO ₂ , CO, VOC	1.0 mmbtu/hr
EU2b	One (1) water based Partwasher and associated burner for Flex line no. 2	5-80-720 A.,C.2.	PM10, SO ₂ , NO ₂ , CO, VOC	1.0 mmbtu/hr
EU3c	One (1) water based Partwasher and associated burner no.1 for Lateral line no. 3	5-80-720 A.,C.2.	PM10, SO ₂ , NO ₂ , CO, VOC	4.0 mmbtu/hr
EU3d	One (1) water based Partwasher and associated burner no. 2 for Lateral line no. 3	5-80-720 A.,C.2.	PM10, SO ₂ , NO ₂ , CO, VOC	4.0 mmbtu/hr
EU4c	One (1) Partwasher and associated burner for line no. 4	5-80-720 A.,C.2.	PM10, SO ₂ , NO ₂ , CO, VOC	2.0 mmbtu/hr
	One (1) Hot Water Heater			0.2 mmbtu/hr
EU5c	One (1) Partwasher and associated burner for Flex line no. 5	5-80-720 A., C.2.	PM10, SO ₂ , NO ₂ , CO, VOC	2.0 mmbtu/hr
EU7	Hand and Machine Welding with MIG wire and bronze rods	5-80-720 C.2.	PM10, manganese compounds, nickel compounds	7,560.0 lb of MIG wire/yr 1,250.0 lb of bronze rod /yr
EU8	Two (2) Lateral System Hot Water Heater	5-80-720 C.2.	PM10, SO ₂ , NO ₂ , CO, VOC	0.2 mmbtu/hr/each
EU9	One (1) Plant Hot Water Heater	5-80-720 C.2.	PM10, SO ₂ , NO ₂ , CO, VOC	0.745 mmbtu/hr
EU10	One (1) Plant Heater for Front Office	5-80-720 C.2.	PM10, SO ₂ , NO ₂ , CO, VOC	0.225 mmbtu/hr
EU11	One (1) Plant Heater	5-80-720 C.2.	PM10, SO ₂ , NO ₂ , CO,	5.2 mmbtu/hr

Table No. II A. Insignificant Emission Unit Inventory List				
Emission Unit No.	Emission Unit Description	Citation (9 VAC_)	Pollutant Emitted (5-80-720 B.)	Rated Capacity* (5-80-720 C.)
	for Absolute Air Unit – Plant		VOC	
EU12	One (1) Plant Heater for Absolute Air Unit – Plant	5-80-720 C.2.	PM10, SO ₂ , NO ₂ , CO, VOC	5.2 mmbtu/hr
EU13	One (1) Plant Heater for Absolute Air Unit – Warehouse	5-80-720 C.2.	PM10, SO ₂ , NO ₂ , CO, VOC	5.2 mmbtu/hr

**: All of the burners associated with the partwashers and the heaters listed in Table No. II A. burn natural gas or liquid petroleum gas (LPG).

B. Significant Emissions Unit Inventory List

(1) Process Units

Table No. II B. 1. Significant Emissions Unit Inventory List – Process Units				
Emission Unit No.	Stack No.	Emission Unit Description	Manufacturer and Date of Construction	Size/Rated Capacity*
EU1		<u>Line 1 – File Line</u> Coating Operations of Steel Furniture, Manual Electrostatic Spray		37.5 gals of coating mixture/hr
	16 & 17	(1) Dry-off/Bake Oven		2.5 mmbtu/hr
	5	Booth no. 1 contains 4 spray guns	Ransburg Electrostatic REA-4 (65 kV)	each gun approx. 10 gals/hr
	6 & 7	Booth no. 2 contains 4 spray guns	Ransburg Electrostatic REA-4 (65 kV)	each gun approx. 10 gals/hr
	6, & 7	(1) Paint Dip Tank		2'6"x2'6"x2'6"

Table No. II B. 1. Significant Emissions Unit Inventory List – Process Units				
Emission Unit No.	Stack No.	Emission Unit Description	Manufacturer and Date of Construction	Size/Rated Capacity*
	(Booth 2)	(1) Air Makeup Heater		volume 3.5 mmbtu/hr
EU2		<u>Line 2 - Flex Line</u> Coating Operations of Steel Furniture, Manual Electrostatic Spray		37.5 gals of coating mixture/hr
	19, 21, 22, & 23	(1) Dry-off/Bake Oven		4.4 mmbtu/hr
		(2) Spray Paint Booths		
	9	Booth no. 1 contains 2 spray guns	Ransburg Electrostatic REA-4 (65 kV)	Each gun approx. 10 gals/hr
	10 & 11	Booth no. 2 contains 4 spray guns	Ransburg Electrostatic REA-4 (65 kV)	Each gun approx. 10 gals/hr
	10 & 11 (Booth 2)	(1) Paint Dip Tank (1) Air Makeup Heater		2'6"x2'6"x2'6" volume 3.5 mmbtu/hr
EU3		<u>Line 3 – Lateral Line</u> Coating Operations of Steel Furniture, Manual Electrostatic Spray		37.5 gals of coating mixture/hr
	38, 42, & 43	(1) Dry-off Oven (4) Spray Paint Booths		4.5 mmbtu/hr

Table No. II B. 1. Significant Emissions Unit Inventory List – Process Units				
Emission Unit No.	Stack No.	Emission Unit Description	Manufacturer and Date of Construction	Size/Rated Capacity*
	29	Booth no. 1 contains 2 spray guns	Ransburg Electrostatic REA-4 (65 kV)	each gun approx. 10 gals/hr
	30	Booth no. 2 contains 2 spray guns	Ransburg Electrostatic REA-4 (65 kV)	each gun approx. 10 gals/hr
	32	Booth no. 3 contains 2 spray guns	Ransburg Electrostatic REA-4 (65 kV)	each gun approx. 10 gals/hr
	33	Booth no. 4 contains 2 spray guns	Ransburg Electrostatic REA-4 (65 kV)	each gun approx. 10 gals/hr
	39, 40, & 41	(1) Bake Oven (2) Air Makeup Heaters		4.5 mmbtu/hr 3.5 mmbtu/hr per each
EU4		<u>Line 4</u> Coating Operations of Steel Furniture, Manual Electrostatic Spray		37.5 gals of coating mixture/hr
	47 & 48	(1) Dry-off Oven		2.5 mmbtu/hr
	49 & 50 /Booth 1 51 & 52 /Booth 2	(2) Spray Paint Booths each contains 4 spray guns	Ransburg Electrostatic REA-4 (65 kV)	each gun approx. 10 gals/hr
	49, 50, 51, & 52	(1) Paint Dip Tank		2'6"x2'6"x2'6" volume

Table No. II B. 1. Significant Emissions Unit Inventory List – Process Units				
Emission Unit No.	Stack No.	Emission Unit Description	Manufacturer and Date of Construction	Size/Rated Capacity*
	53 & 54	(1) Bake Oven (1) Air Makeup Heater		3.5 mmbtu/hr 2.78 mmbtu/hr
EU5		<u>Line 5</u> Coating Operations of Steel Furniture, Manual Electrostatic Spray		37.5 gals of coating mixture/hr
	58 & 59	(1) Dry-off Oven		2.5 mmbtu/hr
	60 & 61 /Booth 1, 62 & 63 /Booth 2	(2) Spray Paint Booths each contains 4 spray guns	Ransburg Electrostatic REA-4 (65kV)	each gun approx. 10 gals/hr
	64 & 65	(1) Bake Oven (1) Air Makeup Heater		3.5 mmbtu/hr 2.78 mmbtu/hr
EU6		One (1) conveyor hook blast system with a cyclone of a 99.0% control efficiency for PM and a 99.5 % control efficiency for PM10	Jet Wheelblast	810 lb hooks/hr

(2) Pollution Control Equipment

Table No. II B. 2 Pollution Control Equipment				
Stack No./ Emission Unit No.	Control Equipment Description	Manufacturer and Date of Construction	Size/Rated Capacity*	Pollutant
5, 6, & 7 / EU1	Metal Baffle Filter System	Polyester Filters AmAir 62 Plus Mer 8	(20x25x2) Capture eff.*: 98% Design eff.*: 99.5%	PM/PM10

Table No. II B. 2 Pollution Control Equipment				
Stack No./ Emission Unit No.	Control Equipment Description	Manufacturer and Date of Construction	Size/Rated Capacity*	Pollutant
			Actual eff.*: 99.5%	
5, 6, & 7 / EU1	Metal Baffle Filter System, Manual Electrostatic Spray Gun	Polyester Filters AmAir 62 Plus Mer 8	(20x25x2)	VOC
9, 10, & 11 / EU2	Metal Baffle Filter System	Polyester Filters AmAir 62 Plus Mer 8	(20x25x2) Capture eff.*: 98% Design eff.*: 99.5% Actual eff.*: 99.5%	PM/PM10
9, 10, & 11 / EU2	Metal Baffle Filter System, Manual Electrostatic Spray Gun	Polyester Filters AmAir 62 Plus Mer 8	(20x25x2)	VOC
29, 30, 32, & 33 /EU3	Metal Baffle Filter System	Polyester Filters AmAir 62 Plus Mer 8	(20x25x2) Capture eff.*: 98% Design eff.*: 99.5% Actual eff.*: 99.5%	PM/PM10
29, 30, 32 & 33 /EU3	Metal Baffle Filter System, Manual Electrostatic Spray Gun	Polyester Filters AmAir 62 Plus Mer 8	(20x25x2)	VOC
49 & 50 / Booth 1 51 & 52/ Booth 2 /EU4	Metal Baffle Filter System	Polyester Filters AmAir 62 Plus Mer 8	(20x25x2) Capture eff.*: 98% Design eff.*: 99.5% Actual eff.*: 99.5%	PM/PM10
49 & 50 / Booth 1 51 & 52/ Booth 2 /EU4	Metal Baffle Filter System, Manual Electrostatic Spray Gun	Polyester Filters AmAir 62 Plus Mer 8	(20x25x2)	VOC
60 & 61 / Booth 1 62 & 63 / Booth 2 /EU5	Metal Baffle Filter System	Polyester Filters AmAir 62 Plus Mer 8	(20x25x2) Capture eff.*: 98% Design eff.*: 99.5% Actual eff.*: 99.5%	PM/PM10

Table No. II B. 2 Pollution Control Equipment				
Stack No./ Emission Unit No.	Control Equipment Description	Manufacturer and Date of Construction	Size/Rated Capacity*	Pollutant
60 & 61 / Booth 1 62 & 63 / Booth 2 /EU5	Metal Baffle Filter System, Manual Electrostatic Spray Gun	Polyester Filters AmAir 62 Plus Mer 8	(20x25x2)	VOC
EU6	Cyclone	Jet Airtechnologies, PHS – 12A	99.0% control efficiency for PM and a 99.5 % control efficiency for PM10	PM/PM10

* The inclusion of values for equipment rated capacities and control equipment efficiencies in Table No. II A. and Table Nos. II B. 1 and 2 (above), are for informational purposes and are not applicable requirements.

C. Emission Unit Limitations

Table No. II.C.1 Allowable Emissions Summary of Criteria Pollutants												
Unit ID	Cond./ Ref. No.	PM ₁₀		NO _x		SO ₂		CO		VOC*		
		lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	lb/day	ton/yr
EU1	Table II.D.1	2.4	5.2	NA	NA	NA	NA	NA	NA	112.5	1,800.0	240.0
EU2	Table II.D.1	2.4	5.2	NA	NA	NA	NA	NA	NA	112.5	1,800.0	240.0
EU3	Table II.D.2	2.4	0.9	NA	NA	NA	NA	NA	NA	105.0	1,680.0	37.9
EU4	Table II.D.3	2.4	1.6	NA	NA	NA	NA	NA	NA	105.0	1,680.0	67.2
EU5	Table II.D.3	2.4	1.6	NA	NA	NA	NA	NA	NA	105.0	1,680.0	67.2
Cleanup	Table II.D.4	NA	NA	NA	NA	NA	NA	NA	NA	NA	17.6	2.1

* From coating/cleaning - not inclusive of VOCs from combustion. VOC emissions from combustion of fuel from the fuel burners/heaters for the ovens and makeup heaters are included in the facility wide emission limitation.

Table No. II.C.2 Allowable Emissions of Hazardous Air Pollutants											
Unit ID	Condition No.	Total HAPs		Napthalene		Xylene		Individual HAP		[individual HAP]	
		lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
EU3	19	NA	NA	4.4	NA	NA	NA	NA	NA	NA	NA
EU4 & EU5	20	NA	NA	4.4	NA	15.4	NA	NA	NA	NA	NA
EU4 & EU5	24	NA	<25.0	NA	NA	NA	NA	<10.0	NA	NA	NA

D. Emission Unit Specific Permit Terms

(1) EU1- (existing) Metal Furniture Coating Application System (Line #1 - File Line)

EU2- (existing) Metal Furniture Coating Application System (Line #2 - Flex Line)

The following emissions from the operation of **each** of the metal furniture coating application systems (EU1 & EU2 - Lines #1 & 2) shall not exceed the limits specified below:

Table II.D.1 Emission Limitations for (EU1) Line #1 – File Line and (EU2) Line #2 – Flex Line (each)					
Regulated Pollutant	Limitation/Standard			Applicable Requirement	Reference Method*
	lb/hr ¹	lb/day ²	ton/yr ³		
PM	2.4	NA	5.2	Condition no. 19, 6/14/01	EPA Method 5, 40 CFR 60, Appendix A
PM10	2.4	NA	5.2	Condition no. 19, 6/14/01	EPA Method 201A, 40 CFR 60, Appendix A
VOC**	112.5	1,800.0	240.0	Condition no. 19, 6/14/01	An analysis of each coating, as applied, using EPA Reference Method 24, 40 CFR 60, Appendix A

- 1 The hourly emission limits established in Table II.D.1 shall be calculated based on daily VOC calculations (as per AQP-4) from each line (EU1 & EU2 - Lines 1 and 2) divided by the number hours of operations per day.
- 2 The daily emission in Table II.D.1 shall be calculated as according to AQP-4 on pages 21 & 22
- 3 The annual emissions in Table II.D.1 shall be calculated monthly as the sum of each consecutive 12 month period.

*: Or equivalent EPA Test Method. (Any testing performed to determine compliance with the pollutant specific emission limitations shall be done in accordance with the reference method listed in the table for each pollutant.)

** : From coating - not inclusive of VOCs from combustion. VOC emissions from combustion of fuel from the fuel burners/heaters for the ovens and makeup heaters are included in the facility wide emission limitation.

Limitations

1. Particulate emissions from the metal furniture coating application systems (EU 1, 2, 3, 4, and 5) Lines # 1, 2, 3, 4, and 5 shall be controlled by a metal baffle filter system. The metal baffle filter system shall be provided with adequate access for inspection.
(9 VAC 5-80-10 H, Condition no. 3 of the NSR permit issued 6/14/01)

2. Volatile organic compound emissions from each of the paint dip tanks for (EU 1, 2 and 4) Lines # 1, 2 and 4 shall be controlled by having a cover on top of the dip tank when not in use. The dip tank and cover shall be provided with adequate access for inspection.
(9 VAC 5-80-10 H, Condition no. 5 of the NSR permit issued 6/14/01)
3. Volatile organic compound (VOC) emissions from the metal furniture coating application systems (EU 1, 2, 3, 4 and 5) Lines #1, 2, 3, 4, and 5 shall be controlled by high-solids coatings and a metal baffle filter system. In addition, the metal furniture coating application systems for (EU 3, 4, and 5) Lines # 3, 4, & 5 will control volatile organic compound (VOC) emissions by the use of manual electrostatic spray guns each with a transfer efficiency of a minimum of 60%.
(9 VAC 5-80-10 H and 9 VAC 5-40-4640, Condition no. 6 of the NSR permit issued 6/14/01)
4. Volatile organic compound (VOC) emissions from cleaning lines of equipment shall be minimized by minimization of the quantity of volatile organic compounds used.
(9 VAC 5-40-4630 C, Condition no. 7 of the NSR permit issued 6/14/01)
5. Volatile organic compound (VOC) emissions from cleaning or purging a system shall be minimized by adjustment of production schedules to minimize coating changes.
(9 VAC 5-40-4630 C, Condition no. 8 of the NSR permit issued 6/14/01)
6. At any one time, there shall be no more than 4 guns in operation per line (EU 1, 2, 3, 4 and 5) Lines 1, 2, 3, 4 and 5.
(9 VAC 5-50-30 F, Condition no. 9 of the NSR permit issued 6/14/01)
7. The daily throughput of VOC to each of the metal furniture coating application systems (EU 1 and 2) Lines # 1 and 2 shall be no more than 1,800.0 pounds per day. The throughput of VOC to each of the metal furniture coating application systems (EU1 and 2) Lines# 1 and 2 shall be no more than 240 tons per year (including VOCs from the paint and thinning solvent), calculated monthly as the sum of each consecutive 12 month period.
(9 VAC 5-170-30, Condition no. 11 of the NSR permit issued 6/14/01)
8. Volatile organic compound emissions from finishing coatings used in each of the metal furniture coating application systems (EU 1 and 2) Lines # 1 and 2 are limited to 3.0 lb VOC/gal less water as a daily average as delivered by the coating applicator.
(9 VAC 5-40-4630 A, Condition no. 15 of the NSR permit issued 6/14/01)
9. Visible emissions from each of the metal furniture coating application systems (EU 1 and 2) Lines# 1 and 2 exhausts shall not exceed twenty (20) percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-170-160 and 9 VAC 5-50-20, Condition no. 27 of the NSR permit issued 6/14/01)

Periodic Monitoring and Recordkeeping

1. The metal baffle filter system shall be checked monthly to verify existence of filters, noting the physical condition of filters and upon noting any clogging or tears or other operational impairments the filters will be replaced immediately.
(9 VAC 5-50-410)
2. Verification of existence of covers on each of the dip tanks for (EU 1 and 2) Lines 1 & 2 when not in use shall be performed upon a new batch of coating mix.
(9 VAC 5-50-410)

3. An initial EPA method 24 shall be performed on each coating as applied (i.e. includes thinning solvents). Subsequent performance of EPA reference method 24 shall be performed on each coating as applied upon formulation change of coating as applied.
(9 VAC 5-40-4690 A, B, and C and 9 VAC 5-50-410)
4. The emissions from each of the metal furniture coating application systems (EU 1 and 2) Lines #1 and 2 shall be observed visually at least once each month for at least a brief time period during normal operations to determine if they have any visible emissions (does not include condensed water vapor/steam), unless a 40 CFR 60 Appendix A Method 9 visible emissions evaluation is performed on the emissions unit. Each emissions unit observed having any visible emissions shall be followed up with a 40 CFR 60 Appendix A Method 9 visible emissions evaluation unless the visible emission condition is corrected as expeditiously as possible and recorded, and the cause and corrective measures taken are recorded.
(9 VAC 5-20-110, 9 VAC 5-50-50 and 9 VAC 5-50-410)

Additional Required Periodic Monitoring and Recordkeeping, see pages 21-23

(2) EU3-Metal Furniture Coating Application System (Line #3 - Lateral Line)

The following emissions from the operation of the metal furniture coating application system (EU 3) Line # 3 shall not exceed the limits specified below:

Table II.D.2 Emission Limitations for (EU3) Line# 3					
Regulated Pollutant	Limitation/Standard			Applicable Requirement	Reference Method*
	lb/hr ¹	lb/day ²	ton/yr ³		
PM	2.4	NA	0.9	Condition no. 20, 6/14/01	EPA Method 5, 40 CFR 60, Appendix A
PM10	2.4	NA	0.9	Condition no. 20, 6/14/01	EPA Method 201A, 40 CFR 60, Appendix A
VOC**	105.0	1,680.0	37.9	Condition no. 20, 6/14/01	Composition of the coatings by formulation data supplied by the manufacturer of the coating or by an analysis of each coating, as received, using EPA Reference Method 24, 40 CFR 60, Appendix A
Napthalene	4.4	NA	NA	Condition no. 20, 6/14/01	EPA Method 18, 40 CFR 60, Appendix A

- 1 The hourly emission limits in Table II.D.2 shall be calculated based on daily VOC calculations (as per AQP-4) from (EU3) Line 3 divided by the number hours of operations per day.
- 2 The daily emission in Table II.D.2 shall be calculated as according to AQP-4 on pages 21 & 22.
- 3 The annual emissions in Table II.D.2 shall be calculated monthly as the sum of each consecutive 12 month period.

- *: Or Equivalent EPA Test Methods. (Any testing performed to determine compliance with the pollutant specific emission limitations shall be done in accordance with the reference method listed in the table for each pollutant.)
- **.: From coating - not inclusive of VOCs from combustion. VOC emissions from combustion of fuel from the fuel burners/heaters for the ovens and makeup heaters are included in the facility wide emission limitation.

Limitations

1. Particulate emissions from the metal furniture coating application systems (EU 1, 2, **3**, 4 and 5) Line # 1, 2, **3**, 4, and 5 shall be controlled by a metal baffle filter system. The metal baffle filter system shall be provided with adequate access for inspection.
(9 VAC 5-80-10 H, Condition no. 3 of the NSR permit issued 6/14/01)
2. Volatile organic compound (VOC) emissions from the metal furniture coating application systems (EU 1, 2, **3**, 4 and 5) Lines #1, 2, **3**, 4, and 5 shall be controlled by high-solids coatings and a metal baffle filter system. In addition, the metal furniture coating application systems for (EU **3**, 4 and 5) Lines # **3**, 4, & 5 will control volatile organic compound (VOC) emissions by the use of manual electrostatic spray guns each with a transfer efficiency of a minimum of 60%
(9 VAC 5-80-10 H and 9 VAC 5-40-4640, Condition no. 6 of the NSR permit issued 6/14/01)
3. Volatile organic compound (VOC) emissions from cleaning lines of equipment shall be minimized by minimization of the quantity of volatile organic compounds used.
(9 VAC 5-40-4630 C, Condition no. 7 of the NSR permit issued 6/14/01)
4. Volatile organic compound (VOC) emissions from cleaning or purging a system shall be minimized by adjustment of production schedules to minimize coating changes.
(9 VAC 5-40-4630 C, Condition no. 8 of the NSR permit issued 6/14/01)
5. At any one time, there shall be no more than 4 guns in operation per line (EU 1, 2, **3**, 4 and 5) Lines 1, 2, **3**, 4 and 5.
(9 VAC 5-40-4630 C, Condition no. 9 of the NSR permit issued 6/14/01)
6. The daily throughput of VOC to each of the metal furniture coating application system (EU 3) Line # 3 shall be no more than 1,680.0 pounds per day. The throughput of VOC to metal furniture coating application system (EU 3) Line #3 shall be no more than 37.9 tons VOC per year (including VOCs from the paint and thinning solvent), calculated as the sum of each 12 consecutive month period.
(9 VAC 5-170-30, Condition no. 12 of the NSR permit issued 6/14/01)
7. Volatile organic compound emissions from finishing coatings used in each of the metal furniture coating application systems (EU **3**, 4 and 5) Lines #**3**, 4, and 5 are limited to 2.8 lb VOC/gal less water as a daily average as delivered by the coating applicator and shall be limited to 7.51 pounds of VOC per gallon of coating solids applied [0.90 Kg of VOC per liter of coating solids applied].
(9 VAC 5-40-4630 A, Condition no. 16 of the NSR permit issued 6/14/01)

Limitation and Initial Visual Emission Evaluation

1. Visible emissions from each of the metal furniture coating application systems (EU **3**, 4, and 5) Lines # **3**, 4, and 5 exhausts shall not exceed five (5) percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). **Visible emission evaluations** shall be conducted on the spray booth exhausts, the dry-off oven, and the bake oven. The **details of the tests** for (EU 3 and 5) Lines #3 and 5 shall be arranged with the Director, Piedmont Region. The permittee shall submit a test protocol at least thirty (30) days prior to testing.

(9 VAC 5-170-160 and 9 VAC 5-50-20, Condition no. 28 of the NSR permit issued 6/14/01)

Periodic Monitoring and Recordkeeping:

Additional Required Periodic Monitoring and Recordkeeping, see pages 21-27

1. The metal baffle filter system shall be checked monthly to verify existence of filters, noting the physical condition of filters and upon noting any clogging or tears or other operational impairments the filters will be replaced immediately.
(9 VAC 5-50-410)
2. The emissions from the metal furniture coating application system (EU 3) Line #3 shall be observed visually at least once each month for at least a brief time period during normal operations to determine if they have any visible emissions (does not include condensed water vapor/steam), unless a 40 CFR 60 Appendix A Method 9 visible emissions evaluation is performed on the emissions unit. If the emissions unit is observed having any visible emissions, it shall be followed up with a 40 CFR 60 Appendix A Method 9 visible emissions evaluation unless the visible emission condition is corrected as expeditiously as possible and recorded, and the cause and corrective measures taken are recorded.
(9 VAC 5-20-110, 9 VAC 5-50-50 and 9 VAC 5-50-410)

Reporting (Also see pages 30 & 31)

1. Visible emissions from each of the metal furniture coating application systems (EU 3, 4, and 5) Lines # 3, 4, and 5 exhausts shall not exceed five (5) percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). **Visible emission evaluations** shall be conducted on the spray booth exhausts, the dry-off oven, and the bake oven. **The details of the tests for (EU 3 and 5) Lines #3 and 5 shall be arranged with the Director, Piedmont Region. The permittee shall submit a test protocol at least thirty (30) days prior to testing.**
(9 VAC 5-170-160 and 9 VAC 5-50-20, Condition no. 28 of the NSR permit issued 6/14/01)

Notification

1. The permittee shall furnish written notification to the Director, Piedmont Region of:
 - a. The actual date on which construction was continued on the metal furniture coating application system (EU5) Line # 5 commenced within 10 days after such date.
 - b. The anticipated start-up date of the metal furniture coating application system (EU5) Line # 5 postmarked not more than 60 days nor less than 30 days prior to such date.
 - c. The actual start-up date of the metal furniture coating application system (EU5) Line # 5 within 10 days after such date.
 - d. The **anticipated date of performance tests** of the metal furniture coating system (EU3 and 5) Lines # 3 and 5 postmarked at least thirty (30) days prior to such date.

Copies of written notification referenced in items a, b and c above to be sent to:

Chief

Air Enforcement Branch (3AT20)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

(9 VAC 5-170-160 and 9 VAC 5-50-50, Condition no. 29 of the NSR permit issued 6/14/01)

(3) EU4-Metal Furniture Coating Application System (Line #4)

EU5-Metal Furniture Coating Application System (Line #5)

The following emissions from the operation of **each** of the metal furniture coating application systems (EU4 and 5) Lines # 4 and 5 shall not exceed the limits specified below. In addition, the **combined** emissions from (EU4 and 5) Lines # 4 and 5 shall not exceed the limits specified below:

Table II.D.3 Emission Limitations for (EU4 and EU5) Lines 4 and 5					
Regulated Pollutant	Limitation/Standard			Applicable Requirement	Reference Method*
	lb/hr ¹	lb/day ²	Ton/yr ³		
PM	2.4	NA	1.6	Condition no. 21, 6/14/01	EPA Method 5, 40 CFR 60, Appendix A
PM10	2.4	NA	1.6	Condition no. 21, 6/14/01	EPA Method 201A, 40 CFR 60, Appendix A
VOC**	105.0	1,680.0	67.2	Condition no. 21, 6/14/01	Composition of the coatings by formulation data supplied by the manufacturer of the coating or by an analysis of each coating, as received, using EPA Reference Method 24, 40 CFR 60, Appendix A
Xylene	15.4	NA	NA	Condition no. 21, 6/14/01	EPA Method 18, 40 CFR 60, Appendix A
Napthalene	4.4	NA	NA	Condition no. 21, 6/14/01	EPA Method 18, 40 CFR 60, Appendix A

- 1 The hourly emission limits in Table II.D.3 shall be calculated based on daily VOC calculations (as per AQP-4) from EU4 and 5 - Lines 4 and 5 divided by the number hours of operations per day.
- 2 The daily emission in Table II.D.3 shall be calculated as according to AQP-4 on pages 21 & 22.
- 3 The annual emissions in Table II.D.3 shall be calculated monthly as the sum of each consecutive 12 month period.

*: Or Equivalent EPA Test Methods. (Any testing performed to determine compliance with the pollutant specific emission limitations shall be done in accordance with the reference method listed in the table for each pollutant.)

**.: From coating - not inclusive of VOCs from combustion. VOC emissions from combustion of fuel from the fuel burners/heaters for the ovens and makeup heaters are included in the facility wide emission limitation.

Limitations

1. Particulate emissions from the metal furniture coating application systems (EU1, 2, 3, **4, and 5**) Line # 1, 2, 3, **4, and 5** shall be controlled by a metal baffle filter system. The metal baffle filter system shall be provided with adequate access for inspection.
(9 VAC 5-80-10 H, Condition no. 3 of the NSR permit issued 6/14/01)
2. Volatile organic compound emissions from each of the paint dip tanks for (EU1, 2, and **4**) Lines # 1, 2, and **4** shall be controlled by having a cover on top of the dip tank when not in use. The dip tank and cover shall be provided with adequate access for inspection.
(9 VAC 5-80-10 H, Condition no. 5 of the NSR permit issued 6/14/01)
3. Volatile organic compound (VOC) emissions from the metal furniture coating application systems (EU1, 2, 3, 4 and 5) Lines #1, 2, 3, **4, and 5** shall be controlled by high-solids coatings and a metal baffle filter system. In addition, the metal furniture coating application systems for (EU3, 4, and 5) Lines # 3, 4, & 5 will control volatile organic compound (VOC) emissions by the use of manual electrostatic spray guns each with a transfer efficiency of a minimum of 60%.
(9 VAC 5-80-10 H and 9 VAC 5-40-4640, Condition no. 6 of the NSR permit issued 6/14/01)
4. Volatile organic compound (VOC) emissions from cleaning lines of equipment shall be minimized by minimization of the quantity of volatile organic compounds used.
(9 VAC 5-40-4630 C, Condition no. 7 of the NSR permit issued 6/14/01)
5. Volatile organic compound (VOC) emissions from cleaning or purging a system shall be minimized by adjustment of production schedules to minimize coating changes.
(9 VAC 5-40-4630 C, Condition no. 8 of the NSR permit issued 6/14/01)
6. At any one time, there shall be no more than 4 guns in operation per line (EU1, 2, 3, 4 and 5) Lines 1, 2, 3, **4 and 5**.
(9 VAC 5-40-4630 C, Condition no. 9 of the NSR permit issued 6/14/01)
7. The daily throughput of VOC to each of the metal furniture coating application systems (EU4 and 5) Lines # 4 and 5 shall be no more than 1,680.0 pounds per day. The throughput of VOC to each of the metal furniture coating application systems (EU4 and 5) Lines# 4 and 5 shall be no more than 67.2 tons per year (including VOCs from the paint and thinning solvent), calculated monthly as the sum of each consecutive 12 month period. In addition, the combined throughput of VOC to the metal furniture coating application systems (EU4 and 5) Lines #4 and 5 shall be no more than 67.2 tons per year (including VOCs from the paint and thinning solvent), calculated monthly as the sum of each consecutive 12 month period.
(9 VAC 5-170-30, Condition no. 13 of the NSR permit issued 6/14/01)
8. Volatile organic compound emissions from finishing coatings used in each of the metal furniture coating application systems (EU3, 4 and 5) Lines #3, **4, and 5** are limited to 2.8 lb VOC/gal less water as a daily average as delivered by the coating applicator and shall be limited to 7.51 pounds of VOC per gallon of coating solids applied [0.90 Kg of VOC per liter of coating solids applied].
(9 VAC 5-40-4630 A, Condition no. 16 of the NSR permit issued 6/14/01)
9. For (EU4 and 5) Lines 4 and 5, the annual emissions of a single hazardous air pollutant (HAP) must

be less than 10 tons/yr and any combination of HAPs must be less than 25.0 tons/yr. For (EU4 and 5) Lines 4 and 5, if any single hazardous air pollutant is 10 tons/yr or more and/or any combination of HAPs is 25 tons/yr or more, a permit application shall be submitted for review.
(9 VAC 5-170-160, Condition no. 25 of the NSR permit issued 6/14/01)

Limitation and Visual Emission Evaluation

1. Visible emissions from each of the metal furniture coating application systems (EU3, **4, and 5**) Lines # 3, **4, and 5** exhausts shall not exceed five (5) percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). **Visible emission evaluations** shall be conducted on the spray booth exhausts, the dry-off oven, and the bake oven. **The details of the tests for (EU 3 and 5) Lines #3 and 5** shall be arranged with the Director, Piedmont Region. The permittee shall submit a test protocol at least thirty (30) days prior to testing.
(9 VAC 5-170-160 and 9 VAC 5-50-20, Condition no. 28 of the NSR permit issued 6/14/01)

Periodic Monitoring and Recordkeeping

Additional Required Periodic Monitoring and Recordkeeping, see pages 21-27

1. The metal baffle filter system shall be checked monthly to verify existence of filters, noting the physical condition of filters and upon noting any clogging or tears or other operational impairments the filters will be replaced immediately.
(9 VAC 5-50-410)
2. Verification of existence of cover on the dip tank for (EU4) Line 4 when not in use shall be performed upon a new batch of coating mix.
(9 VAC 5-50-410)
3. The emissions from each of the metal furniture coating application systems (EU4 and 5) Lines #4 and 5 shall be observed visually at least once each month for at least a brief time period during normal operations to determine if they have any visible emissions (does not include condensed water vapor/steam), unless a 40 CFR 60 Appendix A Method 9 visible emissions evaluation is performed on the emissions unit. Each emissions unit observed having any visible emissions shall be followed up with a 40 CFR 60 Appendix A Method 9 visible emissions evaluation unless the visible emission condition is corrected as expeditiously as possible and recorded, and the cause and corrective measures taken are recorded.
(9 VAC 5-20-110, 9 VAC 5-50-50 and 9 VAC 5-50-410)

Reporting (Also see pages 30 & 31)

1. Visible emissions from each of the metal furniture coating application systems (EU3, **4, and 5**) Lines # 3, **4, and 5** exhausts shall not exceed five (5) percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). **Visible emission evaluations** shall be conducted on the spray booth exhausts, the dry-off oven, and the bake oven. **The details of the tests for (EU3 and 5) Lines #3 and 5 shall be arranged with the Director, Piedmont Region. The permittee shall submit a test protocol at least thirty (30) days prior to testing.**
(9 VAC 5-170-160 and 9 VAC 5-50-20, Condition no. 28 of the NSR permit issued 6/14/01)

Notification

1. The permittee shall furnish written notification to the Director, Piedmont Region of:
 - a. The actual date on which construction was continued on the metal furniture coating application system (EU5) Line # 5 commenced within 10 days after such date.

- b. The anticipated start-up date of the metal furniture coating application system (EU5) Line # 5 postmarked not more than 60 days nor less than 30 days prior to such date.
- c. The actual start-up date of the metal furniture coating application system (EU5) Line # 5 within 10 days after such date.
- d. The anticipated date of performance tests of the metal furniture coating systems (EU3 and 5) Lines #3 and 5 postmarked at least thirty (30) days prior to such date.

Copies of written notification referenced in items a, b and c above to be sent to:

Chief
Air Enforcement Branch (3AT20)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

(9 VAC 5-170-160, condition no. 29 of the NSR permit issued 6/14/01)

- 2. This permit shall become invalid if construction of the proposed metal furniture coating application systems (EU5) Line # 5 is not commenced within eighteen (18) months of the date of this permit or if it is discontinued for a period of eighteen (18) months.
(9 VAC 5-80-10 K, condition no. 36 of the NSR permit issued 6/14/01)

(4) Hook Blasting System (EU6)

Limitation

- 1. Particulate emissions from (EU6) the blasting of conveyor hooks shall be controlled by a cyclone with a 99.0% control efficiency for PM and a 99.5% control efficiency for PM10. The cyclone shall be provided with adequate access for inspection.
(9 VAC 5-80-10 H, condition no. 4 of the NSR permit issued 6/14/01)

Periodic Monitoring

- 1. A material balance shall be performed semi-annually to demonstrate the respective control efficiencies for the cyclone of 99.0% for PM and 99.5% for PM10 for (EU6) conveyor hook blast system.
(9 VAC 5-50-410)

Recordkeeping See page 22

(5) Cleanup

Table II.D.5 Emission Limitations for Cleanup			
Regulated Pollutant	Limitation/Standard		Reference Method*
	lb/day ¹	ton/yr ²	

Table II.D.5 Emission Limitations for Cleanup				
Regulated Pollutant	Limitation/Standard		Applicable Requirement	Reference Method*
	lb/day ¹	ton/yr ²		
VOC	17.6	2.1	Condition no. 22, 6/14/01	Composition of the cleaners by formulation data supplied by the manufacturer of the cleaners or by an analysis of each cleaner, as received, using EPA Reference Method 24, 40 CFR 60, Appendix A

1 The daily emission in Table II.D.5 shall be calculated as according to AQP-4 on pages 21 & 22.

2 The annual emissions in Table II.D.5 shall be calculated monthly as the sum of each consecutive 12 month period.

*: Or equivalent EPA Reference Test Methods. (Any testing performed to determine compliance with the pollutant specific emission limitations shall be done in accordance with the reference method listed in the table for each pollutant.)

Limitations

1. The volatile organic compound throughput associated with cleanup for operation of all of the metal furniture coating application systems (EU1, 2, 3, 4 and 5) Lines # 1, 2, 3, 4, and 5 shall not exceed 2.1 tons per year, calculated monthly as the sum of each consecutive 12 month period.
(9 VAC 5-170-30, Condition no. 17 of the NSR permit issued 6/14/01)

Periodic Monitoring and Recordkeeping

See Below:

Periodic Monitoring and Recordkeeping for (EU1, 2, 3, 4 and 5) Lines 1, 2, 3, 4, and 5, cleanup, and fuel usage:

1. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Director, Piedmont Regional Office. These records shall include, but are not limited to:
 - a. Daily records demonstrating compliance with the requirements in **Air Quality Program Policies and Procedures, Number AQP-4 (Procedures for Maintaining Records for**

Surface Coating Operations and Graphic Arts Printing Processes) from each of the metal furniture coating application systems (EU1, 2, 3, 4 and 5) Lines #1, 2, 3, 4, and 5 along with the maximum number of spray paint guns used at any one time.

Air Quality Program Policies and Procedures, Number AQP-4 states the following:

1. The owner shall maintain the following information at all times:
 - a. Coating application system number.
 - b. Hours of operation per day and per year.
 - c. Method of application.
 - d. Number and types of coats applied to the substrate.
 - e. Drying method.
 - f. Substrate type.
2. The owner shall maintain the following information for **each coating** at all times:
 - a. Supplier name, coating name and identification number.
 - b. Coating density (pounds per gallon).
 - c. Volatile content of coating as supplied (percent by weight).
 - d. Water content of coating as supplied (percent by weight).
 - e. Exempt solvent content of coating as supplied (percent by weight).
 - f. Solids content of coating as supplied (percent by volume)
 - g. Name of diluent added, if any.
 - h. Identification number of diluent.
 - i. Diluent volatile organic compound density (pounds per gallon).
 - j. Volatile organic compound content of diluent (percent by weight).
 - k. Exempt solvent content of diluent (percent by weight).
 - l. Diluent/coating ratio (gallon diluent per gallon coating).
3. The owner shall maintain the following information for **each coating application system** on a **daily** basis:
 - a. Coating application system number.
 - b. Time period of each application run.
 - c. Coating identification number.

- d. Amount of coating used.
 - e. Diluent and clean up solvent identification numbers.
 - f. Amount of diluent used.
 - g. Amount of clean up solvents used.
 - h. Calculated volatile organic compound emissions.
- b. Monthly records demonstrating monthly checks for existence of filters on the metal baffle filter system for (EU1, 2, 3, 4 and 5) Lines 1, 2, 3, 4, and 5 noting the physical condition of filters and if any clogging or tears or other operational impairments occurred, records noting the date and time the filters were replaced.
- c. Records and results of the material balance performed semi-annually to demonstrate the respective control efficiencies for the cyclone of 99.0% for PM and 99.5% for PM10.
- d. Records demonstrating verification of existence of covers on each of the dip tanks for (EU1, 2 and 4) Lines 1, 2 and 4 when not in use shall be performed upon a new batch of coating mix.
- e. Records of performance of initial EPA method 24 on each coating as applied (i.e. includes thinning solvents) along with the results. Records of subsequent performance of EPA reference method 24 on each coating as applied upon formulation change of coating as applied along with the results.
- f. Monthly records demonstrating compliance with the requirements in 40 CFR 60.315 for (EU3, 4, and 5) Lines #3, 4, and 5 as noted in reporting and recordkeeping conditions D.6. (1 and 2).
- g. Records will be kept to demonstrate that all coatings and solvents used are exempt for toxic pollutants (as per the State Regulations) on an hourly and an annual basis except for any permitted toxic pollutants of which records will demonstrate these permitted emission limitations are being met. These records shall be performed and calculated monthly as the sum of each consecutive 12 month period. These records may be requested to be submitted to the department at any time at the department-s discretion.
- h. Records for (EU4 and 5) Lines 4 and 5 will be kept for to demonstrate compliance with condition no. 25 **(of the 6/14/01 NSR permit and the corresponding Title V Limitation II.D.(3)9)**, to show that no single hazardous air pollutant (HAP) is 10 tons/yr or above and no combination of HAPs are 25 tons/yr or above. These records shall be performed and calculated monthly as the sum of each consecutive 12 month period. These records may be requested to be submitted to the department at any time at the department-s discretion.
- i. Current Material Safety Data Sheets (MSDS) shall be kept on site for each surface coating, solvent, and adhesive used in the facility.
- j. Records demonstrating the average daily VOC emissions (in pounds/gallon of coating, excluding water, as delivered by the coating applicator) from each of the metal furniture coating application systems (EU1, 2, 3, 4 and 5) Lines #1, 2, 3, 4, and 5.
- k. Monthly material balance of VOCs used at the facility, to include:

- 1) Throughput of VOCs used in each of the metal furniture coating application systems (EU1, 2, 3, 4 and 5) Lines #1, 2, 3, 4, and 5;
 - 2) Throughput of VOCs used in cleaning operations for (EU1, 2, 3, 4 and 5) Lines # 1, 2, 3, 4, and 5;
 - 3) Throughput of VOCs disposed of offsite;
 - 4) Calculation of emissions.
- I. Annual throughput of natural gas and liquefied petroleum gas (LPG), calculated monthly as the sum of each consecutive 12 month period.
 - m. Total of the previous twelve months' emissions.
 - n. Records of malfunctions of equipment which would cause a violation of any part of this permit.
 - o. Operating procedures, maintenance schedules, and service records for all air pollution-related equipment.
 - p. Relevant and appropriate pollutant-specific emission factors relied upon for the purpose of calculating actual emission rates, the equations used.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-50-50, condition no. 30 of the NSR permit issued 6/14/01 and 9 VAC 5-80-110 F)

(6) NSPS Subpart [EE] - [Standards of Performance for Surface Coating of Metal]

The requirements of 40 CFR 60 Subpart [EE] as described in Table II.D.6 and "Initial and Subsequent Performance Tests" as per 40 CFR 60.313 requirements D(6)1 through D(6)6 and the "Reporting and Recordkeeping" requirements D.(6)1&2 below apply to the following equipment:

EU 3-Metal Furniture Coating Application System (Line #3 - Lateral Line)

EU 4-Metal Furniture Coating Application System (Line #4)

EU 5-Metal Furniture Coating Application System (Line #5)

Table II.D.6 Emission Limitations for (EU3, 4, and 5) Lines 3, 4, & 5

Regulated Pollutant	Limitation/Standard	Applicable Requirement	Reference Method
VOC	<p>0.90 kilogram of VOC per liter of coating solids applied*</p> <p>* On and after the date on which initial performance test required to be conducted by ' 60.8(a) of 40 CFR 60 subpart EE is completed.</p>	' 60.312: Standard for Volatile Organic Compounds (VOC)	Composition of the coatings by formulation data supplied by the manufacturer of the coating or by an analysis of each coating, as received, using EPA Reference Method 24

Limitations

1. Volatile organic compound (VOC) emissions from the metal furniture coating application systems (EU1, 2, 3, 4 and 5) Lines #1, 2, 3, 4, and 5 shall be controlled by high-solids coatings and a metal baffle filter system. In addition, the metal furniture coating application systems for (EU3, 4, and 5) Lines # 3, 4, and 5 will control volatile organic compound (VOC) emissions by the use of **manual electrostatic spray guns each with a transfer efficiency of a minimum of 60%**.
(9 VAC 5-80-10 H and 9 VAC 5-40-4640, Condition no. 6 of the NSR permit issued 6/14/01)
2. Volatile organic compound emissions from finishing coatings used in each of the metal furniture coating application systems (EU3, 4, and 5) Lines #3, 4, and 5 are limited to 2.8 lb VOC/gal less water as a daily average as delivered by the coating applicator and shall be limited to 7.51 pounds of VOC per gallon of coating solids applied **[0.90 Kg of VOC per liter of coating solids applied]**.
(9 VAC 5-40-4630 A, Condition no. 15 of the NSR permit issued 6/14/01)

Periodic Monitoring:

Initial and Subsequent Performance Tests as per 40 CFR 60.313:

1. The HON Company shall conduct an **initial performance test as required** within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of (EU3, 4, and 5) Lines 3, 4, and 5 and thereafter a performance test each calendar month for each affected facility according to the procedures in the following conditions.
(40 CFR 60.313 (a), (b) and 9 VAC 5-60-100)
2. The HON Company shall use the following procedures and periodic monitoring conditions D.6. (3-6) of this permit for determining **monthly volume-weighted average emissions of VOC's in kilograms per liter of coating solids applied (G)**. The owner or operator shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating or by an analysis of each coating, as received, using **Reference Method 24**. The Administrator may require the owner or operator who uses formulation data supplied by the manufacturer of the coating to determine the VOC content of coatings using Reference Method 24. The owner or operator shall determine the volume of coating and the mass of VOC-solvent used for thinning purposes from company records on a monthly basis. If a common coating distribution system serves more than one affected facility or serves both affected and existing facilities, the owner or operator shall estimate the volume of coating used at each facility by using the average dry weight of coating and the surface area coated by each affected and existing facility or by other procedures acceptable to the Administrator.
(40 CFR 60.313 (c) and (c) 1 and 9 VAC 5-60-100)
3. The **volume-weighted average of the total mass of VOC's consumed per unit volume of coating solids applied (G) each calendar month** will be determined by the following procedures.

The **mass of VOC's used (Mo + Md)** during **each calendar month** for (EU3, 4, and 5) Lines 3, 4, and 5 each shall be calculated by the following equation:

$$Mo + Md = \sum_{i=1}^n S_{Lci} D_{ci} W_{oi} + \sum_{j=1}^m S_{Ldj} D_{dj}$$

Md = the mass of diluent VOC-solvent consumed (kilograms)
Mo = the mass of VOC's in coatings consumed, as received (kilograms)

Dc = density of each coating, as received (kilograms per liter)
Dd = density of each diluent VOC-solvent (kilograms per liter)

Lc = the volume of each coating consumed, as received (liters)
Ld = the volume of each diluent VOC-solvent added to coatings (liters)

Wo = the proportion of VOC's in each coating (or input stream), as received (fraction by weight)

($\sum L_{dj} D_{dj}$ will be 0 if no VOC solvent is added to the coatings, as received.)

Where: n is the number of different coatings used during the calendar month and m is the number of different diluent VOC-solvents used during the calendar month.
(40 CFR 60.313 (c)1(i) (A) and 9 VAC 5-60-100)

4. The **total volume of coating solids used (Ls) in each calendar month** for (EU3, 4, and 5) Lines 3, 4, and 5 each shall be calculated by the following equation:

$$L_s = \sum_{i=1}^n L_{ci} V_{si}$$

Ls = the volume of coating solids consumed (liters)

Lc = the volume of each coating consumed, as received (liters)

Vs = the proportion of solids in each coating (or input stream), as received (fraction by volume)

Where: n is the number of different coatings used during the calendar month.
The appropriate transfer efficiencies are listed below. If the owner or operator can demonstrate to the satisfaction of the Administrator that other transfer efficiencies other than those shown are appropriate, the Administrator will approve their use on a case-by-case basis. Transfer efficiency values for application methods not listed below shall be determined by the Administrator on a case-by-case basis. An owner or operator must submit sufficient data for the Administrator to judge the accuracy of the transfer efficiency claims.

Table 1 - Transfer Efficiencies

Manual electrostatic spray60
Dip coat and flow coat90*

*** (Applies to dip tanks on (EU3, 4 and 5) Lines 3, 4, and 5 which were built after the NSPS applicability date.)**

Where more than one application method is used within a single surface coating operation, the owner or operator shall determine the composition and volume of each coating applied by each method through a means acceptable to the Administrator and compute the weighted average transfer efficiency by the following equation:

$$\sum_{i=1}^n \sum_{k=1}^n L_{cik} V_{sik} T_k$$

$$T = \frac{\text{Ls}}{\text{Ls}}$$

T = the transfer efficiency (fraction)

Lc = the volume of each coating consumed, as received (liters)

Ls = the volume of coating solids consumed (liters)

Vs = the proportion of solids in each coating (or input stream), as received (fraction by volume)

Where n is the number of coatings used and p is the number of application methods used.

(40 CFR 60.313 (c)1(i) B and 9 VAC 5-60-100)

5. The **volume-weighted average mass of VOC's consumed per unit volume of coating solids applied (G)** during the calendar month for Lines 3, 4, and 5 each shall be calculated by the following equation:

$$G = \frac{M_o + M_d}{L_s T}$$

G = the volume-weighted average mass of VOC's in coatings consumed in a calendar month per unit volume of coating solids applied (kilograms per liter)

Ls = the volume of coating solids consumed (liters)

Md = the mass of diluent VOC-solvent consumed (kilograms)

Mo = the mass of VOC's in coatings consumed, as received (kilograms)

T = the transfer efficiency (fraction)

(CFR 40 60.313 (c) 1(i) C and 9 VAC 5-60-100)

6. The **volume-weighted average of VOC emissions to the atmosphere (N)** during the calendar month for Lines 3, 4, and 5 each shall be calculated by the following equation:

$$N = G$$

N = the volume weighted average mass of VOC emissions to the atmosphere per unit volume of coating solids applied (kilograms per liter)

G = the volume-weighted average mass of VOC's in coatings consumed in a calendar month per unit volume of coating solids applied (kilograms per liter)

If the volume-weighted average mass of VOC discharged to the atmosphere per **unit volume of coating solids applied (N)** is **less than or equal to 0.90 kilogram per liter**, the affected facility is **in compliance**. If each individual coating used by (EU3, 4 and 5) Lines 3, 4, and 5 has a VOC content, as received, which when divided by the lowest transfer efficiency at which the coating is applied, results in a value equal to or less than 0.90 kilogram per liter, the affected facility is in compliance provided no VOC's are added to the coatings during distribution or application.
(40 CFR 60.313 (c) 1 (ii) and (iii) and 9 VAC 5-60-100)

Reporting and Recordkeeping

1. The HON Co. shall include the following data in the report of the initial performance test required under 40 CFR 60.8(a) (i.e. periodic monitoring condition D.6.1 of this permit):

The volume-weighted average mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) for a period of one calendar month from each affected facility.
(40 CFR 60.315 (a) and 9 VAC 5-60-100)

2. Following the initial performance test, the owner or operator of an affected facility shall identify, record, and submit a written report to the Administrator **every calendar quarter** of each instance in which the volume-weighted average of the total mass of VOC's emitted to the atmosphere per volume of applied coating solids (**N**) **is greater than 0.90 Kg of VOC per liter of coating solids applied**. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to the Administrator semiannually.
(40 CFR 60.315 (b) and b(1) and 9 VAC 5-60-100)

Part III. Facility-wide and General Requirements

A. Facility-Wide Conditions and Permit Terms

(1) Facility-Wide Emission Limitations:

The heaters/burners of the dry-off ovens, bake ovens, and makeup air all consume no more than 419 x 10⁶ cubic feet of natural gas or 4,567,000 gallons of liquid petroleum gas per year, calculated monthly as the sum of each consecutive 12 month period.

(9 VAC 5-170-160, condition no. 14 of the NSR permit issued 6/14/01)

In addition to the emission limits listed in conditions 19, 20, 21 and 22 of this permit **(6/14/01 NSR permit and the corresponding Title V permit requirements Table II.D.1, Table II.D.2, Table II.D.3 and Table II.D.5)**, facility-wide emissions shall not exceed the limits specified below:

Total Suspended Particulate	12.7 lbs/hr*	7.7 ¹ tons/yr*
PM-10	12.7 lbs/hr*	7.7 ¹ tons/yr*
Sulfur Dioxide	0.8 lbs/hr	3.7 ¹ tons/yr
Nitrogen Oxides (as NO ₂)	7.3 lbs/hr	32.0 ¹ tons/yr*
Carbon Monoxide	1.0 lbs/hr	4.3 ¹ tons/yr
Volatile Organic Compounds	540.3 lbs/hr* 8,644.2 lbs/day*	243.0 ¹ tons/yr*

*: The facility wide emissions limits listed in this condition does not include emissions from the units listed under condition no. 2 which has an asterisk beside them **(of the NSR permit issued 6/14/01 and the corresponding Title V permit Table No. II A.)**.

- 1: Annual facility wide emissions shall be determined monthly as the sum of each consecutive 12 month

period.
(9 VAC 5-50-260 and 9 VAC 5-50-180, Condition no. 23 of the NSR permit issued 6/14/01)

In order to minimize the duration and frequency of excess emissions due to malfunctions of process equipment or air pollution control equipment, the permittee shall:

- a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance. These records shall be maintained on site for a period of five years and shall be made available to DEQ personnel upon request.
- b. Maintain an inventory of spare parts that are needed to minimize durations of air pollution control equipment breakdowns.

(9 VAC 5-170-160, Condition no. 34 of the NSR permit issued 6/14/01)

The permittee shall have available written operating procedures for the related air pollution control equipment. Operators shall be trained in the proper operation of all such equipment and shall be familiar with the written operating procedures. These procedures shall be based on the manufacturer's recommendations, at minimum. The permittee shall maintain records of training provided including names of trainees, date of training and nature of training).

(9 VAC 5-170-160, Condition no. 35 of the NSR permit issued 6/14/01)

Annual requirements to fulfill legal obligations to maintain current stationary source emissions data will necessitate your prompt response to requests for information to include, as appropriate: process and production data; changes in control equipment, and operating schedules. Such requests for information from the DEQ will either be in writing or by personal contact. The availability of information submitted to the DEQ or the Board will be governed by applicable provisions of the Freedom of Information Act, ' ' 2.1-340 through 2.1-348 of the Code of Virginia, ' 10.1-1314 (addressing information provided to the Board), and ' 120-02-30 of the State Air Pollution Control Board Regulations. Information provided to federal officials is subject to appropriate federal law and regulations governing confidentiality of such information.

(9 VAC 5-20-160, Condition no. 38 of the NSR permit issued 6/14/01)

A copy of this permit shall be maintained on the premises of the facility to which it applies.

(9 VAC 5-170-160, Condition no. 39 of the NSR permit issued 6/14/01)

(2) Existing source standard for visible emissions

Unless otherwise specified in this part, no owner or other person shall cause or permit to be discharged into the atmosphere from any affected facility any visible emissions which exhibit greater than 20% opacity, except for one six minute period in any one hour of not more than 60% opacity. Failure to meet the requirements of this section because of the presence of water vapor shall not be a violation of this section. This standard is applicable to emission unit (EU6) conveyor hook blast system with a cyclone.

(9 VAC 5-40-80)

(3) New source standard for visible emissions

Unless otherwise specified in this part, no owner or other person shall cause or permit to be discharged into the atmosphere from any affected facility any visible emissions which exhibit greater than 20% opacity, except for one six-minute period in any one hour of not more than 30% opacity. Failure to meet the requirements of this section because of the presence of water vapor shall not be a violation of this section.

This standard is applicable to emission units (EU7) Hand and Machine MIG Welding, (EU8) Lateral System Hot Water Heater, (EU9) Plant Hot Water Heater, (EU10) Plant Heating (Front Office), (EU11) Plant Heating (Absolute Air Unit – Plant), (EU12) Plant Heating (Absolute Air Unit- Plant), and (EU13) Plant Heating

(Absolute Air Unit – Warehouse).
(9 VAC 5-50-80)

(4) Startup, Shutdown and Malfunction

At all times, including periods of startup, shutdown, soot blowing and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
(9 VAC 5-50-20)

B. General Permit Conditions

(1) Specific Facility Wide Recordkeeping Condition And General Recordkeeping Condition:

Current Material Safety Data Sheets (MSDS) shall be kept on site for each surface coating, solvent, and adhesive used in the facility for to demonstrate compliance with conditions 11, 12, 13, 15, 17, 18, 19, 20, 21, 22, 23, 24 and 25 **(from the 6/14/01 NSR permit and the corresponding Title V limitation requirements II.D.(1)7, II.D.(2)6, II.D.(3)7, II.D.(1)8, and II.D.(5)1 and periodic monitoring requirements II.D.(6)1-6 and reporting and recordkeepings II.D.(6)1).**
(9 VAC 5-170-160, Condition no. 26 of the NSR permit issued 6/14/01)

Recordkeeping and reporting

All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:

- (1) The date, place as defined in the permit, and time of sampling or measurements.
- (2) The date(s) analyses were performed.
- (3) The company or entity that performed the analyses.
- (4) The analytical techniques or methods used.
- (5) The results of such analyses.
- (6) The operating conditions existing at the time of sampling or measurement.

(9 VAC 5-80-110 F)

Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.
(9 VAC 5-80-110 F)

The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than **March 1** and **September 1** of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80G, and shall include:

- a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31.
- b. All deviations from permit requirements. For purposes of this permit, a deviation means any condition determined by observation, data from any monitoring protocol or any other monitoring

which is required by the permit that can be used to determine compliance. Deviations include exceedances documented by continuous emission monitoring or excursions from control performance indicators documented through periodic or compliance assurance monitoring.

(9 VAC 5-80-110 F)

(2) Failure/Malfunction Reporting

If, for any reason, the affected facilities or related air pollution control equipment fails or malfunctions and may cause excess emissions for more than one hour, the owner shall notify the Director, Piedmont Regional Office within four (4) daytime business hours of the occurrence. In addition, the owner shall provide a written statement, within 14 days, explaining the problem, corrective action taken, and the estimated duration of the breakdown/shut down. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the board.

(9 VAC 5-20-180 C)

(3) Permit Deviation Reporting

The permittee shall report by the next business day any deviations from permit requirements or any excess emissions, including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventive measures taken.

(9 VAC 5-80-110 F.2)

(4) Severability

The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.

(9 VAC 5-80-110 G.1)

(5) Duty to Comply

The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

(9 VAC 5-80-110 G.2)

(6) Need to Halt or Reduce Activity not a Defense

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(9 VAC 5-80-110 G.3)

(7) Permit Action for Cause

This permit may be modified, revoked, reopened, and reissued, or terminated for cause as specified in 9 VAC 5-80-110 L, 9 VAC 5-80-240 and 9 VAC 5-80-260. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

(9 VAC 5-80-110 G.4)

Such changes that may require a permit modification and/or revisions include, but are not limited to, the following:

- a. Erection, fabrication, installation, addition, or modification of an emissions unit (which is the source, or part of it, which emits or has the potential to emit any regulated air pollutant), or of a source, where there is, or there is the potential of, a resulting emissions increase;
- b. Reconstruction or replacement of any emissions unit or components thereof such that its capital

cost exceeds 50% of the cost of a whole new unit;

- c. Any change at a source which causes emission of a pollutant not previously emitted, an increase in emissions, production, throughput, hours of operation, or fuel use greater than those allowed by the permit, or by 9 VAC 5-80-11, unless such an increase is authorized by an emission cap; or any change at a source which causes an increase in emissions resulting from a reduction in control efficiency, unless such an increase is authorized by an emissions cap;
- d. Any reduction of the height of a stack or of a point of emissions, or the addition of any obstruction which hinders the vertical motion of exhaust;
- e. Any change at the source which affects its compliance with conditions in this permit, including conditions relating to monitoring, recordkeeping, and reporting;
- f. Addition of an emissions unit which qualifies as insignificant by emissions rate (9 VAC 5-80-720 B) or by size or production rate (9 VAC 5-80-720 C);
- g. Any change in insignificant activities, as defined by 9 VAC 5-80-90 D.1.a(1) and by 9 VAC 5-80-720 B and 9 VAC 5-80-720 C.

(9 VAC 5-80-110 G, 9 VAC 5-80-110 J, 9 VAC 5-80-240, and 9 VAC 5-80-260)

(8) Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege.
(9 VAC 5-80-110 G.5)

(9) Duty to Submit Information

The permittee shall furnish to the board, within a reasonable time, any information that the board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the board along with a claim of confidentiality.
(9 VAC 5-80-110 G.6)

Any document (including reports) required in a permit condition to be submitted to the board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G.
(9 VAC 5-80-110 K.1)

(10) Duty to Supplement or Correct Application

Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.
(9 VAC 5-80-80 E)

(11) Duty to Pay Permit Fees

The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-305 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-355.
(9 VAC 5-80-110 H)

(12) Changes to Permits for Emissions Trading

No permit revision shall be required, under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.

(9 VAC 5-80-110 I)

(13) Alternative operating scenarios

Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80 Article 1. (9 VAC 5-80-110 J)

(14) Inspection and entry requirements

The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:

- C Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.
- C Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.
- C Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.
- C Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9 VAC 5-80-110 G.5)

(15) Annual Compliance Certification

Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than **March 1** each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices. The compliance certification shall comply with such additional requirements that may be specified pursuant to ' 114(a)(3) and ' 504(b) of the federal Clean Air Act. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

- C The time period included in the certification. The time period to be addressed is January 1 to December 31.
- C A description of the means for assessing or monitoring the compliance of the source with its emissions limitations, standards, and work practices.
- C The identification of each term or condition of the permit that is the basis of the certification.
- C The status of compliance with the terms and conditions of this permit for the certification period.
- C Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance.
- C Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the

compliance status of the source at the time of certification and over the certification period.

- C Such other facts as the permit may require to determine the compliance status of the source.

One copy of the annual compliance certification shall be sent to EPA at the following address:

Clean Air Act Title V Compliance Certification (3APOO)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

(9 VAC 5-80-110 K.5)

(16) Reopening For Cause

The permit shall be reopened by the board if additional federal requirements become applicable to a major source with a remaining permit term of three or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F.

The permit shall be reopened if the board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

The permit shall be reopened if the administrator or the board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

The permit shall not be reopened by the board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.

(9 VAC 5-80-110 L)

(17) Permit Availability

Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.

(9 VAC 5-80-150 E)

(18) Transfer of Permits

No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.

(9 VAC 5-80-160)

In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.

(9 VAC 5-80-160)

In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200.

(9 VAC 5-80-160)

(19) Permit Expiration

This permit shall become invalid five years from the date of issuance. The permittee shall submit an application for renewal of this permit no earlier than 18 months and no later than six months prior to the date of expiration of this permit. Upon receipt of a complete and timely application for renewal, this source may continue to operate subject to final action by the DEQ on the renewal application.
(9 VAC 5-80-110 D and 9 VAC 5-80-80 F)

(20) Malfunction as an Affirmative Defense

A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the conditions of the following paragraph are met.

The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:

- C A malfunction occurred and the permittee can identify the cause or causes of the malfunction.
- C The permitted facility was at the time being properly operated.
- C During the period of the malfunction the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.
- C The permittee notified the board of the malfunction within two working days following the time when the emissions limitations were exceeded due to the malfunction. This notification shall include a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notification may be delivered either orally or in writing. The notification may be delivered by electronic mail, facsimile transmission, telephone, telegraph, or any other method that allows the permittee to comply with the deadline. The notice fulfills the requirement of 9 VAC 5-80-110 F.2. b to report promptly deviations from permit requirements. This notification does not release the permittee from the malfunction reporting requirements under 9 VAC 5-20-180 C.

In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any requirement applicable to the source.
(9 VAC 5-80-250)

(21) Permit Revocation or Termination for Cause

A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of this article. The board may suspend, under such conditions and for such period of time as the board may prescribe, any permit for any of the grounds for revocation or termination or for any other violations of these regulations.
(9 VAC 5-80-260)

(22) Federal Enforceability

All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.
(9 VAC 5-80-110 N)

(23) Stratospheric Ozone Protection

If the permittee handles or emits one or more Class I or II substance subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.
(40 CFR Part 82, Subparts A - F)

(24) Accidental Release Prevention

If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.

(40 CFR Part 68)

C. Emissions Trading

Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:

1. All terms and conditions required under 9 VAC 5-80-110 except subsection N shall be included to determine compliance.
2. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.
3. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.

(9 VAC 5-80-110 I)

(D) Permit Shield

Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been explicitly deemed to be not applicable to this permitted facility:

Citation	Title of Citation	Description of applicability
CFR 40 Part 63 (112 g)	CFR 40 Part 63	A Case by Case MACT
Conditions nos. 20 and 21 of the 6/14/01 NSR permit	Condition nos. 20 and 21 of the 6/14/01 NSR permit	AQP-2 requirement was streamlined by 40 CFR 60.313
Condition no. 10 of the 6/14/01 NSR permit	Condition no. 10 of the 6/14/01 NSR permit	Condition no. 10 of the 6/14/01 NSR permit which refers to "test ports" was streamlined by Part III B.15 of this permit

Nothing in this permit shield shall alter the provisions of ' 303 of the Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by the (i) administrator pursuant to ' 114 of the Clean Air Act, (ii) the Board pursuant to ' 10.1-1314 or ' 10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to ' 10.1-1307.3 of the Virginia Air Pollution Control Law.

(9 VAC 5-80-140)

(E) State-only Enforceable Requirements

The following terms and conditions are not required under the federal Clean Air Act or under any of its applicable federal requirements, and are not subject to the requirements of 9 VAC 5-80-290 concerning review of proposed permits by EPA and draft permits by affected states.

1. Odor

2. State toxics rule

- a. The following emissions from the operation of the metal furniture coating application system (Line # 3) shall not exceed the limits specified below:

Total Suspended Particulate	2.4 lbs/hr	0.9 tons/yr
PM ₁₀	2.4 lbs/hr	0.9 tons/yr
Volatile Organic Compounds	105.0 lbs/hr 1,680.0 lbs/day	37.9 tons/yr
Napthalene	4.4 lbs/hr	

Compliance shall be determined as stated in condition numbers 3, 6, 9, 12, 14, 16, 18, 24, 25, 26, 28, 30 and AQP-2.
(9 VAC 5-50-260 and 9 VAC 5-50-180)

* **Only the items in bold are the ones that are only state applicable. In addition, AQP-2 was streamlined as the listed condition no. 18 (which refers to 40 CFR 60.313) performs the same function as AQP-2.)**

- b. The following emissions from the operation of each of the metal furniture coating application systems (Lines # 4 and 5) shall not exceed the limits specified below. In addition, the combined emissions from Lines # 4 and 5 shall not exceed the limits specified below:

Total Suspended Particulate	2.4 lbs/hr	1.6 tons/yr
PM ₁₀	2.4 lbs/hr	1.6 tons/yr
Volatile Organic Compounds	105.0 lbs/hr 1,680.0 lbs/day	67.2 tons/yr
Xylene	15.4 lbs/hr	
Napthalene	4.4 lbs/hr	

Compliance shall be determined as stated in condition numbers 3, 5, 6, 9, 13, 14, 15, 18, 24, 25, 26, 28, 30, and AQP-2.
(9 VAC 5-50-260 and 9 VAC 5-50-180)

* **Only the items in bold are the ones that are only state applicable. In addition, AQP-2 was streamlined as the listed condition no. 18 (which refers to 40 CFR 60.313) performs the same function as AQP-2.)**

- c. For (EU3, 4, & 5) Lines 3, 4, & 5, The HON Company may use new paint formulations and solvents which will yield an uncontrolled emission rate of a new toxic pollutant or result in an increase of the uncontrolled emission rate of a toxic pollutant equal to or less than the exemption levels for toxic pollutants as determined by the exemption formulas listed under 9 VAC 5-80-11 I (or be permitted as such). This is provided the uncontrolled emission rate (or increase in the uncontrolled emission rate) of the toxic pollutant does not exceed 22.8 pounds per hour or 100 tons per year. In addition, this is provided the toxic pollutant emission limitations listed in conditions 20 and 21 **(of the 6/14/01 NSR permit and corresponding Title V requirements table II.D.2 and table II.D.3)** are being

met. If, any of the toxic pollutant emissions for (EU3, 4 & 5) Lines 3, 4, & 5 are above the exemption levels for toxic pollutants or above 22.8 pounds per hour or 100 tons per year or above the toxic pollutant limitations of conditions 20 and 21 **(of the 6/14/01 NSR permit and corresponding Title V requirements table II.D.2 and table II.D.3)**, a permit application must be submitted to the department for review before emission of the toxic pollutant shall commence.

(9 VAC 5-170-160 of State Regulations, Condition no. 24 of the NSR permit issued 6/14/01)

- d. Current Material Safety Data Sheets (MSDS) shall be kept on site for each surface coating, solvent, and adhesive used in the facility for to demonstrate compliance with conditions 11, 12, 13, 15, 17, 18, 19, 20, 21, 22, 23, **24** and 25 **(from the 6/14/01 NSR permit and the corresponding Title V limitation requirements II.D.(1)7, II.D.(2)6, II.D.(3)7, II.D.(1)8, and II.D.(5)1 and periodic monitoring requirements II.D.(6)1-6 and reporting and recordkeepings II.D.(6)1)** **This is the only State applicable requirement condition the rest are federally enforceable.**
(9 VAC 5-170-160 of State Regulations, Condition no. 26 of the NSR permit issued 6/14/01)
- e. Records will be kept to demonstrate that all coatings and solvents used are exempt for toxic pollutants (as per the State Regulations) on an hourly and an annual basis except for any permitted toxic pollutants of which records will demonstrate these permitted emission limitations are being met. These records shall be performed and calculated monthly as the sum of each consecutive 12 month period. These records may be requested to be submitted to the department at any time at the department's discretion.
(9 VAC 5-170-160 of State Regulations, Condition no. 30 c of the NSR permit issued 6/14/01)
- f. If, for any reason, the permitted facility or related air pollution control equipment fails or malfunctions and may cause excess emissions for more than one hour, the owner shall notify the Director, Piedmont Region within four (4) business hours of the occurrence. The portion of the facility which is subject to the provisions of **Rule 4-3 or 5-3 (toxics)** shall shut down immediately upon request of the DEQ. In addition, the owner shall provide a written statement, within seven (7) days, explaining the problem, corrective action taken, and the estimated duration of the breakdown/shutdown.
(9 VAC 5-20-180 of State Regulations, Condition no. 33 of the NSR permit issued 6/14/01)

(9 VAC 5-80-110 N, and 9 VAC 5-80-300)